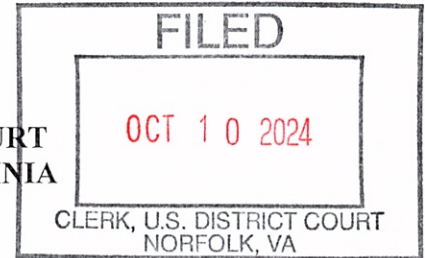


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division



IN THE MATTER OF THE ISSUANCE
OF A CRIMINAL COMPLAINT RE:

JOHNNY THIEL BANKS

UNDER SEAL

Case No. 2:24-mj- 160

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Blake Alfred Thomas, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with United States Department of Homeland Security, U.S. Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations (HSI), and have been so employed since August 2023. I am an investigator or law enforcement officer of the United States within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a federal agent empowered to conduct investigations and engaged in enforcing the federal criminal statutes. I am currently assigned to work on the Hampton Roads Human Trafficking Task Force within the Norfolk, Virginia Division of HSI. My experience includes the investigation of cases involving human trafficking and the use of facilities of interstate and foreign commerce in furtherance of such crimes. As part of my employment as a Special Agent, I have successfully completed the Criminal Investigator Training Program at the Federal Law Enforcement Training Center and the Homeland Security Investigations Special Agent Training (HSISAT) in Glynco, Georgia. I have received training in the investigation of criminal violations of federal law within the jurisdiction of HSI, and I have received specialized training in the investigation of human trafficking and child exploitation. Additionally, I have received specialized training and gained

specific experience in arrest procedures, the execution of search and seizure warrants, and various other criminal laws and procedures. Prior to this appointment, I served as a Police Officer with the City of Norfolk, Virginia for over nine (9) years.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for an arrest warrant, this affidavit does not set forth each and every fact learned by me or observed by me during the course of this investigation. This affidavit includes only the facts I believe are necessary to establish probable cause to believe that JOHNNY THIEL BANKS ("BANKS") has committed the following offenses: violations of Sex Trafficking of a Minor or by Force, Fraud or Coercion, in violation of 18 U.S.C. § 1591, and Attempted Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

STATUTORY AUTHORITY

3. Title 18, United States Code, Section 1591(a)(1) and (b)(2), prohibits a person from knowingly in or affecting interstate or foreign commerce, recruiting, enticing, harboring, transporting, providing, obtaining, advertising, maintaining, patronizing, and soliciting by any means, a person, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means would be used to cause the person to engage in a commercial sex act. Title 18, United States Code, Section 1591(a)(1) and (b)(2) prohibits a person from knowingly in or affecting interstate or foreign commerce, recruiting, enticing, harboring, transporting, providing, obtaining, advertising, maintaining, patronizing, and soliciting by any means, a person, having had a reasonable opportunity to observe the person and knowingly

and in reckless disregard of the fact that the persons had not attained the age of 18 years and would be caused to engage in a commercial sex act.

4. Title 18, United States Code, § 2251(a) states that any person who employs, uses, persuades, induces, entices, or coerces any minor to engage in, or who has a minor assist any other person to engage in, or who transports any minor in or affecting interstate or foreign commerce, or attempts to do the same... with the intent that such minor engage in, any sexually explicit conduct for the purpose of producing any visual depiction of such conduct or for the purpose of transmitting a live visual depiction of such conduct shall be punished... if such person knows or has reason to know that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce or mailed, if that visual depiction was produced or transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

PROBABLE CAUSE

Initial Investigation

5. Homeland Security Investigations (HSI) Norfolk and the Virginia Beach Police Department (VBPD), through the HSI Norfolk-led Hampton Roads Human Trafficking Task Force (HRHT-TF) are investigating BANKS for criminal violations including sex trafficking of a minor and by force, fraud, and coercion. As detailed below, the investigation to date has revealed that in July 2024, BANKS transported Jane Doe, a minor, from North Carolina to Virginia and sex-trafficked Jane Doe at a hotel in Suffolk, Virginia. BANKS then transported Jane Doe back to North Carolina. At a later date in July 2024, BANKS again transported Jane Doe from North Carolina to Virginia, specifically to a hotel at the Virginia Beach Oceanfront for the purpose of

sex-trafficking Jane Doe. During the course of sex-trafficking Jane Doe, BANKS directed Jane Doe to produce child sexual abuse material (CSAM).

6. This case first came to the attention of the investigative team on or about July 31, 2024, when Virginia Beach Police Department (VBPD) received a call for service. The caller reported that a juvenile female, Jane Doe, was in Virginia Beach, Virginia. The caller further advised that Jane Doe was reported missing from Charlotte, North Carolina approximately one and a half weeks prior to the call. The caller advised that Jane Doe was with a male named “Johnny” and that the male had a gray Kia Sorento. The caller told law enforcement that the caller had spoken to Jane Doe, and that Jane Doe cried, was with the male, and did not know how to get away. The caller further advised that the male was trying to get Jane Doe to “sell her body” and Jane Doe did not want to do it. The caller also provided a phone number for Jane Doe. In July and August 2024, Jane Doe was 15-years-old.

7. Law enforcement obtained an emergency cellphone ping for Jane Doe’s phone and at approximately 10:56 p.m. on July 31, 2024, the investigative team located Jane Doe in the parking garage of a hotel (Subject Hotel One) at an address on Atlantic Ave in Virginia Beach. At the time she was encountered by law enforcement, she was sitting in a gray Kia Sorento with Florida tags, consistent with the information provided by the caller.

8. While VBPD was making initial contact with Jane Doe, a male who was later identified as BANKS, walked out of the Subject Hotel 1 and began walking in the direction of the VBPD officers. Jane Doe identified BANKS as the individual with whom she was traveling and staying at the Subject Hotel 1. Based on these initial statements made by Jane Doe, VBPD detained BANKS.

9. Jane Doe informed VBPD that she met BANKS in Charlotte, North Carolina several months ago and they hangout from time to time. Jane Doe stated that BANKS transported her from Charlotte, North Carolina to Virginia Beach, Virginia on July 31, 2024. Jane Doe informed officers that once she arrived in Virginia Beach, Virginia they checked into Subject Hotel 1. Hotel records from Subject Hotel 1 reflect that room #610 was booked in BANKS's name and listed the contact number for BANKS as 704-576-3379. Video footage confirms BANKS and Jane Doe coming and going from the room. Multiple dates were set up for Subject Hotel 1 and johns came to the location, however based on the investigation to date, no commercial sex appointments, or "dates" were completed at Subject Hotel 1. A search warrant was executed on the hotel room, but nothing of evidentiary value was located inside.

Victim Interviews of Jane Doe

10. Jane Doe was interviewed by VBPD Detectives and also interviewed in a later forensic interview. A cell phone was recovered from Jane Doe. Jane Doe informed the investigative team that there were multiple messages from BANKS on a social media messaging app where he threatened her. The investigative team has secured a search warrant for Jane Doe's phone, but based on current forensic capabilities, the phone has not been forensically examined at this time.

11. Jane Doe stated that she had previously traveled from North Carolina with BANKS and had engaged in commercial sex for BANKS. She also stated that BANKS took her back to North Carolina, and that on a later date, BANKS took her from a house in Charlotte, North Carolina and brought her back to Virginia Beach. Jane Doe further advised that BANKS physically assaulted her, strangled her, and threatened to kill her.

12. Jane Doe informed VBPD detectives that she had posted commercial sex advertisements to the website megapersonals.com for the purpose of sex trafficking. Through training and experience your affiant knows the website megapersonals.com to primarily be used to promote commercial sex and sex trafficking.

Arrest of BANKS

13. VBPD detectives called the phone listed on the hotel registry (704-576-3379) and observed a phone in BANKS' possession began to ring. Officers confirmed that the incoming call was from the phone number they used to place the call. Based off the preliminary investigation conducted by VBPD, BANKS was placed into custody. Search incident to arrest revealed BANKS had two Apple iPhones in his possession. As officers retrieved the phones from BANKS' they observed text messages on the home screen pertaining to sex trafficking. The messages read "in call," "I have 220 for bare. LOL," "Ok how much," and "here." Based on my training and experience, an "in call" refers to when a commercial sex customer visits a sex worker at a residence or hotel room for commercial sex, and "bare" refers to engaging in sexual activity without a condom. Based on my training and experience, these messages are consistent with commercial sex and/or sex trafficking.

14. Megapersonals provided records to the investigative team which include a commercial sex advertisement of Jane Doe that was posted on July 31, 2024. The ad location is Oceanfront with the listed phone number ending in 3379 (the phone number of the phone recovered in BANKS' pocket).

15. In a post-*Miranda* interview with the investigative team, BANKS admitted to knowing Jane Doe and claimed he knew her for approximately one week. He admitted to

transporting Jane Doe from Charlotte to Virginia Beach. He denied knowing her name or that she was a juvenile.

Cell Phone Search Warrant of BANKS

16. Pursuant to a state search warrant, VBPD conducted a forensic review of the Apple iPhone with the registered phone number of 704-576-3379. Text message conversations were recovered, including a text message exchange between BANKS and Jane Doe where BANKS uses the victim's name. The text reads "lol [JANE DOE] if u think u bouta play with me think again" the very next text message reads "I'll really out smart u and have u floating in a creek." Additional messages between BANKS and Jane Doe were recovered where BANKS messaged Jane Doe saying, "ok well give him head for 150 tell him 500 not enough to go out of state" and "Take some sitting on the sink holding ur pantries to the side with yo pussy showing." A search of photos located on the phone revealed an image of a female posing on top of a hotel sink pulling her panties to the side exposing her genitalia.

17. Pursuant to a state search warrant, VBPD with the assistance of HSI conducted a forensic extraction of the second Apple iPhone that was in BANKS's possession during the time of his arrest. This extraction reveled stored photos of Jane Doe where is she is completely nude exposing her breast and genitalia. Additional photographs were found of Jane Doe that matched the photographs posted to the advertisement on Megapersonals.com. A conversation was recovered from the messaging platform Snapchat that revealed that BANKS used the username banks4pf to communicate with individuals on the platform. During one of the conversations BANKS ask for another user to assist him with setting up a megapersonals.com account for his "little friend."

Sex-Trafficking of Jane Doe at Subject Hotel 2

18. The forensic examination of the phone with a phone number ending in 3379 (the phone number of the phone recovered in BANKS' pocket) further showed messages about a previous hotel, Subject Hotel 2, located at an address on Holland Road in Suffolk, Virginia, where BANKS brought JANE DOE. BANKS rented the hotel room in his name. Law enforcement obtained hotel video footage from Subject Hotel 2 depicting BANKS and the victim at this hotel. Text messages indicate that multiple "dates" took place from approximately July 14, 2024 through July 18, 2024. Law enforcement also obtained commercial sex advertisements that were posted online of Jane Doe in Hampton Roads during this time period.

Kia Sorento Search Warrant

19. Pursuant to a state search warrant, VBPD searched the vehicle that Jane Doe was located in during the time VBPD initially make contact with her and BANKS. The vehicle was a gray Kia Sorento bearing Florida license plates. Jane Done stated that BANKS used this vehicle to transport her from Charlotte, North Carolina to Virginia Beach, Virginia. During the search of the vehicle, a black handgun model Glock 27 pistol was recovered. BANKS is a convicted felon.

BANKS's Jail Communications

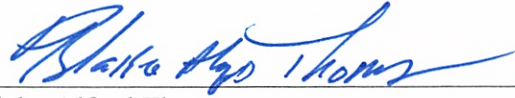
20. BANKS has been detained at the Virginia Beach City Jail since his arrest in July 2024. On an August 2, 2024 call, BANKS made a statement to the effect of "they got a search warrant for the car and my room and they found my gun." On an August 8, 2024 call placed by BANKS, he stated "the police don god damn fucked up my pimpn."

CONCLUSION

21. Based on the forgoing facts, along with my training and experience, I believe there is sufficient probable cause to believe that in or around July 2024, BANKS has committed a violation of Sex Trafficking by Force, Fraud and Coercion and Sex Trafficking of a Minor or by

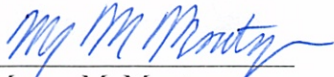
Force, Fraud, or Coercion, in violation of 18 U.S.C. § 1591(a)(1), (b)(1), and (b)(2), and a violation of Attempted Sexual Exploitation of Children, in violation of 18 U.S.C. § 2251(a).

Respectfully submitted,



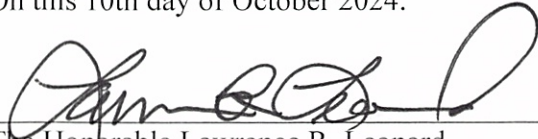
Blake Alfred Thomas
Special Agent
Homeland Security Investigations

Read and Approved:



Megan M. Montoya
Assistant U.S. Attorney

Subscribed and sworn to before me
On this 10th day of October 2024.



The Honorable Lawrence R. Leonard
United States Magistrate Judge